

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

Kurt Taylor 216804  
Full name and prison number  
of plaintiff(s)

2006 FEB 13 A 10:28

DEBRA A. JACKSON  
CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

v. Comm.  
P. Whatley Donal Campbell  
T. Brown Asst Comm. T. Jones  
B. Spencer  
Ms. Golsa  
Mr. Blackledge  
Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

CIVIL ACTION NO. 2:06cv035-WKW  
(To be supplied by the clerk  
of U.S. District Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES( ) NO(✓)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES( ) NO(✓)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit: .

Plaintiff(s) Kurt Taylor

Defendant(s) Warden Hoff

2. Court (if federal court, name the district; if state court, name the county) Middle

3. Docket number CV-1016-A
4. Name of judge to whom case was assigned Susan Walker
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) Pending
6. Approximate date of filing lawsuit Aug. 2003
7. Approximate date of disposition -

II. PLACE OF PRESENT CONFINEMENT Holman Unit

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Bullock, Holman

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>P. Whatley</u>	<u>301 So. Ripley, Mont. Ala. 36104</u>
2.	<u>T. Brown</u>	<u>" "</u>
3.	<u>B. Spencer</u>	<u>" "</u>
4.	<u>Ms. Golsa</u>	<u>" "</u>
5.	<u>Mr. Blackledge</u>	<u>P.O. Box 5107, Union Springs, Ala. 36089</u>
6.	<u>Comm. Donal Campbell</u>	<u>1400 Lloyd St. Mont. Ala. 36107</u>
	<u>Asst. Comm. T. Jones</u>	<u>11 So. Union St. Mont. Ala. 36130</u>

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 10-8-04

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: 1st 4th 8th 14th

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Mr. Blackledge forged my reclassification paper as well as lied when counting my security level points

GROUND TWO: 1<sup>st</sup> 4<sup>th</sup> 8<sup>th</sup> 14<sup>th</sup>

SUPPORTING FACTS: Mr. Whalley, T. Brown, B. Spenser, and Ms. Golsa all conspired in this illegal action allowing Mr. Blackledge to over score (18 pts.) my security level which is originally (10 pts)

GROUND THREE: 1<sup>st</sup> 4<sup>th</sup> 8<sup>th</sup> 14<sup>th</sup>

SUPPORTING FACTS: The Defs. allowed for me to be transferred to Holman knowing my score of 18 pts. was illegal. Mr. Blackledge did this because of my lawsuit in the USDC of other Defs at the Bullock institution of violation, cruelty, assault, perjury of disciplinary, not writing disciplinary's when I was assaulted by other inmates, because there was a contract put out on my life for anyone to hurt, and/or kill me because I was bringing to the attention to the USDC and the world of the behavior that was going on by professional who did this for a living and the world was paying them, not to mistreat human beings, but ~~to~~ to guard criminals, not to abuse them like I was being abused by the defs. which are responsible for the care & welfare of inmates in Ala. Prison System

(7)  
and the Defs. are allowing this to happen to individuals, not protecting them at any cost. Their condoning illegal behavior that has happened to me, that's why its continuing to happen, the assaults, and the mistreatment of human being.

I have written personally to the Def. P. Whatley explaining to him what's happening and I've heard anything, he don't care about inmates and the brutality that I'm going through in the past & present

I'm now at Holman Prison illegally and these staff members are using death row inmates as their personal chef knowing those guys are waiting to die so they will do anything for a little money, benefits etc. etc. This mistreatment is being used by all shifts everyday of the week as well as the state food is also been used at times, but they feed the inmates cold and uncooked meals

The guards are allowed to work over time which consists of sleep, hostile attitudes, writing bogus disciplinary's because they're tired & sleepy

I recieved assault write-ups because of throwing water out my cell because of the Nurse denial to see me on body chart status because of pains in my side that I had complained of from 3:00 pm - 11:00 pm and the officers refused to take me down for treatment and I was begging and pleading for help I didn't know what else to do?? 3rd shift took me!

The Defs. have the jobs but they're not doing what the job description defines, assaults are rapid at these facilities and the Defs. are aware of this and do nothing, they are making a joke of the State of Ala. and what their job is. I don't know what to do except die back here.

(S)

I Filed an appeal while at Holman, because Bullock said that was it, and the appeal got ~~to~~ lost for a year, then it got turned down by the Defs. B. Spencer + Mr. Golsa that this illegal reclass is not an appealable matter, ever though it was illegal what is the appeal for? The Defs. don't care about human life all they are concerned with is a check (money)

Two friend of mines Poppa Kane died because of Negilenece to Negilence to get him a X-ray after bumping his head against the wall. Randy Free a known sucial patient who threaten to Mr. Blackledge that he would kill himself, and Mr. Blackledge just laughed and Randy Free killed himself that very day because of Negilence. This is Defs. are part of this because they don't ask any questions or investerigate they would see it clear as day.

Mr. Whatley and the Defs. are just ~~dis~~ sitting in Montgomery (inmates) letting things just happen to me, and everyone's scared because they know the consequences.

Comm. Campbell + Asst. Comm. Jones are letting these violations happen to me with their knowledge of wrong doing, aganist the policy & Laws of the State of Ala. Const. and their doing anything to stop this!!!

Respectfully Submitted

Kurt Taylor

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

for the Defs. to correct my status

---

---

Kent Taylor

Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 2-6-06  
(Date)

Kent Taylor

Signature of plaintiff(s)